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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2011-687*

13 **GEOFF W. WEST, a.k.a. GEOFFREY W.**  
14 **WEST**  
15 **3331 Orion Avenue**  
16 **Cincinnati, OH 45213**  
17 **Registered Nurse License No. 756338**

**A C C U S A T I O N**

Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
22 Consumer Affairs.

23 2. On or about July 29, 2010, the Board of Registered Nursing issued Registered Nurse  
24 License Number 756338 to Geoff W. West, also known as Geoffrey W. West (Respondent). The  
25 Registered Nurse License will expire on November 30, 2012, unless renewed.  
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1       “(b) Procuring his or her certificate or license by fraud, misrepresentation, or mistake.

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3       “(e) Making or giving any false statement or information in connection with the application  
4 for issuance of a certificate or license.”

5                               COST RECOVERY

6       8.     Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
7 administrative law judge to direct a licentiate found to have committed a violation or violations of  
8 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
9 enforcement of the case.

10                               FIRST CAUSE FOR DISCIPLINE

11                               (Unprofessional Conduct – Ohio Discipline)  
12                               (Bus. & Prof. Code §2761(a)(4))

13       9.     Respondent has subjected his registered nurse license to disciplinary action under  
14 Code section 2761, subdivision (a)(4), in that on or about March 20, 2009, in a disciplinary action  
15 before the Ohio Board of Nursing (Ohio Board), the Ohio Board entered a Consent Agreement  
16 with Respondent staying the suspension of his Ohio registered nurse license on the condition that  
17 Respondent follow various probationary terms, conditions, and limitations until at least March  
18 2011. The terms and conditions of Respondent’s probation required Respondent to: (1) obey all  
19 federal, state, and local laws, and all laws and rules governing the practice of nursing in Ohio;  
20 (2) appear in person for interviews before the Ohio Board; (3) by November 1, 2009, successfully  
21 complete six educational hours in ethics and professionalism and ten educational hours in  
22 maintaining professional boundaries; (4) notify the Ohio Board of the name and address of each  
23 employer prior to accepting employment; (5) within 15 days of the effective date of the Consent  
24 Agreement, if working in a position where a nursing license is required, notify his employer of  
25 the Consent Order and notify all future employers in nursing of the Consent Order and provide  
26 them a copy of such Order; (6) cause each employer in nursing to submit quarterly written reports  
27 beginning April 1, 2009; (7) report any violation of the Consent Agreement to the Ohio Board  
28 within 30 days of such violation; (8) sign release of information forms; (9) submit any and all

1 information that the Board may request regarding Respondent's ability to practice according to  
2 acceptable and prevailing standards of safe nursing practice; (10) not submit or cause to be  
3 submitted any false, misleading, or deceptive statements, information, or documentation to the  
4 Ohio Board, employers, or potential employers; (11) notify the Ohio Board within five days of  
5 any change in employment status, residence, or home telephone number; (12) during the term of  
6 the Consent Agreement, not practice as a registered nurse with agencies providing home care in  
7 the patient's residence, hospice care programs providing hospice care in the patient's residence,  
8 staffing agencies or pools, as an independent provider, or for an individual or groups of  
9 individuals who directly engage Respondent to provide nursing service, unless otherwise  
10 approved in advance, in writing, by the Ohio Board; and (13) not function in a position or  
11 employment where the job duties or requirements involve management of nursing or nursing  
12 responsibilities, or supervising and evaluating nursing practice.

13 10. The underlying conduct supporting the Ohio Board's disciplinary action is that on or  
14 about November 6, 2008, Respondent was evaluated at The Center for Marital and Sexual Health  
15 (The Center), in accordance with an Examination Order issued by the Ohio Board on or about  
16 September 16, 2008. The Ohio Board's Examination Order was based upon Respondent's  
17 September 2007 termination from University Hospital/Health Alliance (Alliance) in Cincinnati,  
18 Ohio. Respondent was terminated from Alliance for violating hospital policies. Specifically,  
19 Respondent engaged in conduct that was considered detrimental to patient care, fellow associates,  
20 or hospital operations. Respondent also physically or verbally abused patients, visitors,  
21 physicians, or assistants. There were incidents at Alliance involving allegations that Respondent  
22 examined female patients in an inappropriate manner, sat in patient rooms with the door shut, and  
23 failed to respond to staff calls and pages. The Center for Marital and Sexual Health concluded  
24 that Respondent's problems at Alliance may have been due to a lack of experience, training, or  
25 sensitivity to privacy issues in caring for female patients, as well as Respondent's need to perform  
26 as a "super nurse." While The Center concluded that Respondent appeared to be safe to practice  
27 nursing, The Center recommended that in light of the circumstances related to his termination  
28 from Alliance, Respondent enter a monitoring agreement with the Ohio Board for a period of one

1 year so that Respondent's employers would have an opportunity to provide feedback to the Ohio  
2 Board regarding Respondent's practice. Respondent signed the Consent Agreement on or about  
3 January 1, 2009.

4 SECOND CAUSE FOR DISCIPLINE

5 (Unprofessional Conduct – Misrepresentation in Procuring License)  
6 (Bus. & Prof. Code §2761(b))

7 11. Complainant realleges the allegations contained in paragraphs 9 and 10 above, and  
8 incorporates them by reference as if fully set forth.

9 12. Respondent has subjected his registered nurse license to disciplinary action under  
10 Code section 2761, subdivision (b), in that he procured his nursing certification from the Board  
11 through misrepresentation. The circumstances are as follows:

12 13. On or about December 5, 2008, Respondent submitted his Application for Licensure  
13 by Endorsement to the California Board. In signing and submitting his application, Respondent  
14 acknowledged that he fully understood his obligation to immediately report to the California  
15 Board any disciplinary action against any health-care related license or certificate that occurred  
16 between the date of his application and the date that his California registered nurse license was  
17 issued. Respondent also acknowledged that he fully understood that failure to report any such  
18 discipline to the California Board could result in subsequent disciplinary action against his  
19 license. Respondent's Ohio registered nurse license was disciplined by the Ohio Board on or  
20 about March 20, 2009. Respondent's California registered nurse license was issued on or about  
21 July 29, 2010. Respondent failed to report the discipline taken against his Ohio registered nurse  
22 license to the California Board, which constitutes a misrepresentation.

23 14. On or about September 1, 2010, Respondent submitted a Supplemental Information  
24 Report to the California Board in connection with the renewal of his California registered nurse  
25 license. In the Supplemental Information Report, Respondent denied having had any license  
26 disciplined by a government agency or other disciplinary body since he last renewed his license.  
27 Respondent again failed to disclose to the California Board that his Ohio registered nurse license  
28 was disciplined by the Ohio Board on or about March 20, 2009.

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15. Complainant realleges the allegations contained in paragraphs 9 through 14 above, and incorporates them by reference as if fully set forth.

## PRA YER

1. Revoking or suspending Registered Nurse License Number 756338, issued to Geoff W. West, also known as Geoffrey W. West;

3. Taking such other and further action as deemed necessary and proper.

February 7, 2011

*Louise R. Bailey*  
LOUISE R. BAILEY, M.ED., RN  
Executive Officer

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